

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
AT CORPUS CHRISTI**

CASE NO.: 2:24-cv-00162

IVAN RADIC,

Plaintiff,

v.

TE PROSPERITY INSURANCE AGENCY,
LLC,

Defendant.

COMPLAINT FOR COPYRIGHT INFRINGEMENT

(INJUNCTIVE RELIEF DEMANDED)

Plaintiff IVAN RADIC by and through his undersigned counsel, brings this Complaint against Defendant TE PROSPERITY INSURANCE AGENCY, LLC for damages and injunctive relief, and in support thereof states as follows:

SUMMARY OF THE ACTION

1. Plaintiff IVAN RADIC (“Radic”) brings this action for violations of exclusive rights under the Copyright Act, 17 U.S.C. § 106, to copy and distribute Radic’s original copyrighted Work of authorship.
2. Radic has been a professional photographer since 2017. Radic works with many different clients and focuses on different styles of photography.
3. Defendant TE PROSPERITY INSURANCE AGENCY, LLC (“TE”) is an independent insurance agency that offers home, auto and business insurance. At all times relevant herein, TE owned the Facebook Page “TE Prosperity Insurance Agency LLC” located at

the internet URL www.facebook.com/profile.php?id=100063456943735 (the “TE Facebook Page”).

4. Radic alleges that Defendant copied Radic’s copyrighted Work from the internet in order to advertise, market and promote its business activities. TE committed the violations alleged in connection with Defendant’s business for purposes of advertising and promoting sales to the public in the course and scope of the TE’s business.

JURISDICTION AND VENUE

5. This is an action arising under the Copyright Act, 17 U.S.C. § 501.

6. This Court has subject matter jurisdiction over these claims pursuant to 28 U.S.C. §§ 1331, 1338(a).

7. Defendant is subject to personal jurisdiction in Texas.

8. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) and 1400(a) because the events giving rise to the claims occurred in this district, TE engaged in infringement in this district, TE resides in this district, and TE is subject to personal jurisdiction in this district.

DEFENDANT

9. TE Prosperity Insurance Agency, LLC is a Texas Limited Liability Company, with its principal place of business at 601 East Main Street, Suite 150, Alice, Texas, 78333, and can be served by serving its Registered Agent, Elida S. Ramirez, at the same address.

THE COPYRIGHTED WORK AT ISSUE

10. In 2019, Radic created the photograph entitled “A young woman in a red jacket driving a car,” which is shown below and referred to herein as the “Work”.



11. Radic registered the Work with the Register of Copyrights on January 12, 2021, as a group registration. The group registration was assigned registration number VA 2-239-707. The Certificate of Registration is attached hereto as **Exhibit 1**.

12. Radic's Work is protected by copyright but was not otherwise confidential, proprietary, or trade secrets.

13. At all relevant times, Radic was the owner of the copyrighted Work at issue in this case.

INFRINGEMENT BY TE

14. TE has never been licensed to use the Work at issue in this action for any purpose.

15. On a date after the Work at issue in this action was created but before the filing of this action, TE copied the Work.

16. On or about September 14, 2022, Radic discovered the unauthorized use of his Work on the TE Facebook Page in a post dated on or about August 22, 2022.

17. TE copied Radic's copyrighted Work without Radic's permission.

18. After TE copied the Work, it made further copies and distributed the Work on the internet to promote the sale of goods and services as part of its insurance business.

19. TE copied and distributed Radic's copyrighted Work in connection with Defendant's business for purposes of advertising and promoting Defendant's business, and in the course and scope of advertising and selling products and services.

20. Radic's Work is protected by copyright but is not otherwise confidential, proprietary, or trade secrets.

21. TE committed copyright infringement of the Work as evidenced by the documents attached hereto as **Exhibit 2**.

22. Radic never gave Defendant permission or authority to copy, distribute, or display the Work at issue in this case.

23. Radic notified TE of the allegations set forth herein on March 28, 2024, and April 18, 2024. To date, the parties have failed to resolve this matter.

COPYRIGHT INFRINGEMENT

24. Radic incorporates the allegations of paragraphs 1 through 23 of this Complaint as if fully set forth herein.

25. Radic owns a valid copyright in the Work at issue in this case.

26. Radic registered the Work at issue in this case with the Register of Copyrights pursuant to 17 U.S.C. § 411(a).

27. TE copied, displayed, and distributed the Work at issue in this case and made derivatives of the Work without Radic's authorization in violation of 17 U.S.C. § 501.

28. TE performed the acts alleged in the course and scope of its business activities.

29. Defendant's acts were willful.

30. Radic has been damaged.

31. The harm caused to Radic has been irreparable.

WHEREFORE, Plaintiff IVAN RADIC prays for judgment against Defendant TE PROSPERITY INSURANCE AGENCY, LLC that:

a. TE and its officers, agents, servants, employees, affiliated entities, and all of those in active concert with them, be preliminarily and permanently enjoined from committing the acts alleged herein in violation of 17 U.S.C. § 501;

b. TE be required to pay Radic his actual damages and Defendant's profits attributable to the infringement, or, at Radic's election, statutory damages, as provided in 17 U.S.C. § 504

c. Radic be awarded his attorneys' fees and costs of suit under the applicable statutes sued upon;

d. Radic be awarded pre- and post-judgment interest; and

e. Radic be awarded such other and further relief as the Court deems just and proper.

JURY DEMAND

Radic hereby demands a trial by jury of all issues so triable.

Dated: July 18, 2024

Respectfully submitted,

/s/ Sangheon Han
SANGHEON HAN

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Counsel for Plaintiff Ivan Radic

Exhibit

1

Copyright

United States Copyright Office

Library buildings are closed to the public until further notice, but the U.S. Copyright Office Catalog is available. [More.](#)

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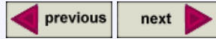
Start Over

Public Catalog

Copyright Catalog (1978 to present)

Search Request: Builder = (Ivan Radic)[in Name Claimant]

Search Results: Displaying 6 of 8 entries



Labeled View

*Ivan Radic - Group Registration Photos - Published May 24 2019 to November...***Type of Work:** Visual Material**Registration Number / Date:** VA0002239707 / 2021-01-12**Application Title:** Ivan Radic - Group Registration Photos - Published May 24 2019 to November 2 2019; 750 photos**Title:** Ivan Radic - Group Registration Photos - Published May 24 2019 to November 2 2019; 750 photos. [Group registration of published photographs. 750 photographs. 2019-05-24 to 2019-11-02]**Description:** 750 photographs : Electronic file (eService)**Copyright Claimant:** Ivan Radic. Address: Alpengasse 10/5, Vienna, 1100, Austria.**Date of Creation:** 2019**Publication Date Range:** 2019-05-24 to 2019-11-02**Nation of First Publication:** Austria**Authorship on Application:** Ivan Radic; Citizenship: Austria. Authorship: photographs.**Copyright Note:** Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Photographs: Published in October 2019 (40 photographs): Horse riders riding into the sunset, Close-up of a man's hand rubbing a horse's nose, Horses pulling a carriage, Horse rider shaking hands with an onlooker, Junge Reiter zu Pferd waehrend einer Parade, Light brown horses with long manes pulling a carriage, Reiter in Tracht reiten durch die Stadt, Men driving a horse carriage into the sunset, Junger Mann fhrt Pferd mit Jockey am Zuegel, Empty start box before the horse race, Erschoepftes Rennpferd wird gewaschen. Wassertropfen fliegen ueberall, Garbed horse riders awaiting the start of a spear throwing competition, Flags of various organisations at a horse race, Horse being photographed with a phone up close, Hellbraune Pferde mit langen Mnchen ziehen einen Pferdewagen, Horse rider blowing up dust in the distance. Scene being shot under a start box, Horse rider with spear in hand, Horse waiting for his owner under a tree, Grapes fallen autumn leaves and nuts on a wooden table from a bird's eye view, A young woman in a red jacket driving a car, Old farmer's dirty hand on a rusty tractor fender, An old man taking a tire off an aluminium wheel, Interior of a corn barn, The front of an old and rusty Rakovica tractor, An old farmer's hand on the steering wheel of a tractor, An old and experienced craftsman measuring a wheel for agricultural machinery, Spotted butterfly on a red flower, Einstellrad fuer Belichtungszeit an einer analogen Kamera, Ad booklet in a car door handle. Excessive advertising, Close-up of a horse's short mane, Yound riders on horseback during a parade, Horses with riders on the city streets, Close-up portrait shot of a carriage horse, Parade of the horse riders, Mann streichelt ein Pferd an der Nase, Spotted white horses pulling a cab, Vintage horse carriages on the city streets during a carnival, Professional headphones under the camera during a live television broadcast, Pferd wirbelt Staub auf, Trick rider standing on trotting horses

Published in October 2019 (35 photographs): Young man in Serbian garb riding a horse, Audio monitoring desk at a large event, Horse riders with flags, Hausgemachte Muffins mit Schokosplittern im Ofen, Junger man in serbischer Tracht reitet auf einem Pferd, A hand holding an old compact disc as optical media is nearing its end of life, A slice of pizza on a black plate at a restaurant, Dried tomatoes in a greenhouse. The end of summer, Happy boy and girl ride on a toy car, Muffin und abgefallene Blaetter als Bildkonzept fuer Herbst, An old farmer peeling beans by hand, Cutting hot pizza at a restaurant, Baking pizza at a restaurant. A chef pulling out the pizza using a protective glove, Kleines Kind spielt mit Weintrauben auf einem Weingut, Kleinkind spielt mit Holzbausteinen und frdert dabei seine Motorik abstraktes Denken und Kreativitaet, A park path with fallen leaves in autumn, Abgefallene Blaetter bedecken einen Pfad im Park, Details of an old and rustic wardrobe, Ants carrying a larger insect back to their anthill, Little girl playing with wooden blocks and developing her reasoning and analytical skills, Mladi vitez u nosnji jase konja, Small colorful decorative windmill in a flowerpot on the window bench, Top view of a roller covered with paint on a bucket. The floor is covered with nylon to protect it from splashing, Horse race spectators observing the warm up before the race, Berittene Ritter auf dem Weg zum Wettbewerbsgelaende. Ljubicevske konjicke igre 2019, Besitzer fuehrt sein Pferd Richtung Stall, Berittener Bogenschuetze in serbischer Tracht, Besitzer fuehrt sein Rennpferd am Zuegel, Calm horse enjoying a bath, Close-up of white carriage horses with people in the blurry background, Different varieties of horse gigs placed in front of a stable, Close-up portrait shot of a racing horse, Galoppierende Pferde beim Pferderennen, White horse pulling a hackney carriage with another cab in the blurry background, Black horses pulling a carriage with driver and passanger in blurry foreground

Published in October 2019 (40 photographs): Scheune voll von entkernten Maiskolben, Verrostete alte Maschine auf einem Bauernhof, Uncovering a large pumpkin under the leaves, Rad eines Pferdewagens. Nahaufnahme, Pumpkin growing under the leaves of the plant, Rusty old machine on a farm, Graffiti Guy Fawkes mask on building wall, Picnic wickerbasket on the back seat of an oldtimer car, Josef raus ausn Haefn. ANTIFA Graffiti, Nahaufnahme einer Nacktschnecke im Garten, Close-up of a beautiful pink flower with yellow anthers, A car and its shadow, Close-up of yellow lichen, Close-up portrait of an ostrich, Beach illuminated by warm light of the sun low on the horizon. Long exposure, A chef in an uniform serving a slice of pizza at a restaurant, Making a cupcake with cream chocolate, A decorative serving of ketchup on a pizza table at a restaurant, A cook decorating tasty muffins with chocolate crumbs, Coffee pouring out of an espresso machine into two cups, A wooden background in autumn style with leaves and a muffin, Homemade muffins with chocolate crumbs in a baking tray in an oven, Leaf with holes made by unknown pest, Young man holding a rifle, Top view of a terrarium full of bark and dead leaves, Men in traditional Serbian costume riding horses. A line of horse riders in traditional attire on horseback. Rider netting his horse. Man in uniform on horseback. Man adjusting audio on a

horse, A flock of sheep in a farmyard, A flock of sheep standing on a pasture looking at the camera, Glasses and cutlery on a table at a luxury restaurant, Free tables, A flock of sheep in a farm yard, Close-up of an ashtray full of cigarettes butts, Close-up of a butterfly on a yellow-green leaf, A little girl picking grapes at a vineyard, A room with two buckets and nylon protection ready for renovation including repainting walls, A waiter placing two pizzas on a wooden table at a restaurant, A small child developing analytical skills and motor functions while playing with wooden blocks, Alter Bauer haelt geschaelte Bohnen in der Hand

Published in October 2019 (34 photographs): Amazon logo on company website displayed on computer screen with ripple effect, Booking.com logo on company website displayed on computer screen with ripple effect, Dropbox logo on company website displayed on computer screen with ripple effect, ESPN logo on company website displayed on computer screen with ripple effect, LinkedIn logo on company website displayed on computer screen with ripple effect, Pornhub logo on company website displayed on computer screen with ripple effect, Zillow logo on company website displayed on computer screen with ripple effect, YouTube logo on company website displayed on computer screen with ripple effect, BITFINEX logo on company website displayed on computer screen with ripple effect, Comcast Corporation logo on company website displayed on computer screen with ripple effect, Prudential logo on company website displayed on computer screen with ripple effect, Close-up of chestnuts on a tree, Altria Group logo on company website displayed on computer screen with ripple effect, A pile of firewood, Gruen-gelber Kuerbis waechst unter den Blaettern der Pflanze, Aufgehaengerter Knoblauchzopf auf einem Bauernhof, Barn full of bare corn cobs, Aufgehaengerter Zwiebelzopf auf einem Bauernhof, Close-up of a cucumber on the dirt, Close-up of a hokkaido pumpkin, Close-up of a garlic braid on a farm, Kraft Heinz Company logo on company website displayed on computer screen with ripple effect, Goldman Sachs logo on company website displayed on computer screen with ripple effect, Image of the driver on the back side of a horse carriage, Bild des Fahrers an der Vorderseite eines Pferdewagens, Pumpkin growing on a tree, Close-up of an onion braid on a farm, Close-up of a wheel on a horse carriage, Kuerbis im eigenen Garten, Nahaufnahme, Kuerbis waechst auf einem Baum, Man holding his hand on a large pumpkin, Man lying on the ground and watching the stars, Nahaufnahme von gestapeltem Brennholz, Suspension and wheel on an old horse carriage

Published in October 2019 (36 photographs): Truck with tank spraying water onto the racing track at a hippodrome, Trotting race with close outcome, Little girl leading a race horse by its reins, Close-up of a horse being washed, Galloping horses crossing the finish line, Horse archer in garb, Galopprennen auf Gras, Horse rider holding a saber in hand, Additional riders in blurry background, Horse rider holding a javelin in hand, Horse rider with spear at competition awaiting his turn to throw, Jockey doing a u-turn with his bolted horse, Horses and their owners leaving the hippodrome, Pferde in vollem Galopp bei einem Rennen, Portrait eines Pferdes, Nahaufnahme, Reiter wirft einen letzten Blick auf sein Wurfespeer, Portrait shot of a Serbian knight in traditional garb, Spannendes Trabrennen, Rennpferd wird nach dem Rennen gewaschen, Abkuehlung, Vitezovi na svojom konjima. 56. Ljubicevske konjicke igre, Traber beim Trabrennen, Water truck spraying horse racing track, Young man washing a horse, Fiaker auf den Strassen waehrend eines Umzugs, Maehne eines Pferds im Fokus. Verschwommener Hintergrund, Manes flying in the wind while the horses are pulling a carriage, Nahaufnahme von Kutschpferden, Horse riders at knight competition with sabers in hands, Horse riders in traditional garb during Ljubicevske konjicke igre, Horse with harness warming up for the upcoming race, Jockeys on horses being led by their respective owners, Jockey carrying a saddle, Jockeys reiten im Kreis vor einem Rennen, Horse at full gallop barely touching the ground, Helping a horse cool off after a race with a cold shower, Horse bathing, Horse being led by its owner

Published in November 2019 (15 photographs): Owner holding his race horse by its reins, Owner with reins still on the track after the race has begun, Safety hazard, Pferde galoppieren der Ziellinie entgegen, Pferd und Besitzer verlassen die Reitbahn, Reiter bei Ritterk◆mpfen mit S◆beln in H◆nden, Race horse cooling off during a bath, Reiter beim Speerwurf Wettkampf, Spectators at a horse race, Serbische Ritter reiten ihre Pferde warm f◆r den Wettbewerb. Ljubicevske konjicke igare 2019, Starkes Pferd wird gewaschen. Sichtbare Blutgef◆sse unter der Haut, Junger Mann w◆scht ein Pferd. Nahaufnahme, Jockey preparing his horse for the race starting with wrapping its legs with bandages, Man drying a horse after a bath, Lastwagen mit Wassertank spr◆ht Wasser auf die Reitbahn, Horse being washed by its owner

Published in May 2019 (38 photographs): Schwarzer Ritterfalter auf einem grossen Blatt, Nahaufnahme von Schmetterlingspuppen, Winzige spiralf◆rmige Liane einer Kletterpflanze, Wunderschoene tropische orangefarbene Blume, Large butterfly on jeans pants, Leaf in a small puddle on a larger tropical leaf, Schriftzug Frohe Ostern bei einem Stand auf dem Ostermarkt Schoenbrunn, Riesige gelbe und blaue Ostereier am Ostermarkt, traffic sign indicating a road block due to roadworks ahead, Teddy bear greeting tourists on arrival, Schriftzug Frohe Ostern bei einem Stand auf dem Ostermarkt, Verkehrszeichen warnt vor Strassensperre aufgrund von Bauarbeiten, Tropical vegetation and a small manmade waterfall, Bike helmet tied to the seat of a moped, Fiaker vor dem Schloss Schoenbrunn, Close-up of moped handlebar including speedometer and mirrors, Baby sleeping in its buggy in a park, Close up of a protest sign with text Free all refugees, Close-up of a protest sign with text Stop All Deportations, Demoschild mit dem Text Kein Mensch ist illegal, Deadpool loves you poster in a store, Green light on a bicycle traffic light car lights in the background, Demoschild mit dem Text Stop All Deportations, Green traffic light for bikes, Hive Mirotroller in Wien, Gr◆ne Fahne mit dem Text SOLIDARIT◆T auf einer Demo, Keine Abschiebung nach Afghanistan Slogan auf einem Protestbanner, Protestplakat mit durchkreuztem Gesicht von Sebastian Kurz und dem Text FIGHT NEOLIBERALISM, Leihrad von Citybike Wien mit verschwommenem Hintergrund, Close-up of a professional video camera with light on a tripod, Close-up of a green bicycle on a traffic light, Nahaufnahme eines gruenen Fahrrads auf einer Fahrradampel, Nahaufnahme eines roten Ampelmaennchens, Nahaufnahme eines roten Fahrrads auf einer Ampel, Lichter im Hintergrund, Nahaufnahme eines roten Fahrrads auf einer Fahrradampel, Omas gegen rechts auf einer Donnerstagsdemo, Neon sign on a building with text We Are All Mad Here, People at a political rally walking

Published in May 2019 (28 photographs): Plakate mit Rassismus toetet Menschen Slogans bei einer Demo, Leuchtendes U der U-Bahn U3 vor dunkelblauem Abendhimmel, Protester holding a waving ANTIFA flag, Leuchtendes Verkehrszeichen Vorrang gewaehren mit einer vorbeigehenden Menschenmenge im Hintergrund, Nahaufnahme eines gruenen Ampelmaennchens, Leuchtreklame auf einem Gebaude mit dem Text We Are All Mad Here, Protestplakat mit dem Text Abschiebung ist Verbrechen, Protestplakate mit dem Text Rassismus toetet Menschen, Red star sticker on a post with blurry background, Red light on a bicycle traffic light car lights in the background, Red traffic light for bikes, Traffic cone in the foreground and people walking by in the background, YIELD traffic sign with a huge crowd of people walking by in the background, Traffic cone in the foreground and road works in the background, ZONE geschrieben auf dem Asphalt und Menschen im Hintergrund, ZONE written on tarmac with a political rally taking place in the blurry background, Menschen Laufen bei einer Demo, Polizeibeamte auf Motorrad und zu Fuss bei einer Demo, Protester holding a sign We Demand Our Rights and Freedom at a rally, Blond young woman working on her laptop, Maximum gain. Close-up of a gain knob turned all the way to the max, Maximum bass. Close-up of a bass knob turned all the way to the max, Maximum volume. Close-up of a volume knob turned all the way to the max, Nahaufnahme einer Festplatte auf schwarzem Hintergrund, A female hand with pen on notepad working on laptop in office, A bunch of puzzle pieces, Blond business woman writing and working on a laptop in her creative room, AMD text and logo on a desktop computer CPU fan

Published in June 2019 (41 photographs): Close up of a female hand writing on a notepad, Tired and worried business woman holding her head while sitting in an office, Close up of a hard disk drive on a black background, Geschaeftsfrau arbeitet am Laptop im modernen Buero eines Startups, Child touching a plug socket cover with its finger, Man regulates the temperature and program of the oven, Little carps swimming in water garden, A little girl driving a yellow toy car, A bunch of rusty padlocks. Symbol for everlasting love, A woman's hand holding an ice cream cone, Close-up of a BMW logo on a motorbike, Close-up of an AUDI logo, Close-up of a SUZUKI logo on a motorbike, Close-up of a rose in a park, Close-up of a colorful wasp on the finger, Close-up of a TOYOTA lettering on a rusty wheel rim, Donaukanal und Urania in Wien, Blick auf Motto am Fluss und vor Anker liegende Schiffe, CD diplomatic vehicle registration plate on a car, Blue Danube vor Anker am Donaukanal in Wien, Unter der Schwedenbruecke in Wien, Nahaufnahme vom TOYOTA Schriftzug auf einer verrosteten Radfelge, Nahaufnahme von rot-weissem Absperrband, Nahaufnahme vom verrosteten Feuerhydrant, People relaxing while sitting on a park bench, Schlosspark beim Schloss Schoenbrunn, A father holding his son's hand in the garden, A little girl holding her favorite bear in her hands, A funny baby girl playing in puddles with her hand in the water, Disposing grass into a masonry trolley, A professional gardener mowing a lawn and arranging a garden, Siblings waiting for their meal in the kitchen, A boy stepping on colored chalk, A cute little girl playing with toys at home, A brother and a sister playing with bubbles on the grass, Kleines Maedchen spielt mit Stofftieren, Kleines Maedchen druchstoebt Kiste nach Stofftieren, A little girl looking for a toy in a box, Mowing grass with a professional mower, A little girl playing with lots of colorful toys. Turtle toy in baby's hands, A mother a son and a daughter playing with bubbles on the grass

mower a son and a daughter playing with bubbles on the grass

Published in June 2019 (53 photographs): A mom teaching children how to draw on concrete with colored chalk, A mower in the garden during mowing, Red panda dozing in a hammock, Close-up of a leopard, Close-up of a guppy, Close-up of a crocodile, Donkey at the zoo, Crow washing itself in a creek, Close-up of a prairie dog young, Portrait of a flamingo, Leopard attack, Qualle auf dunklem Hintergrund, eBike by Cannondale, Electric motor inside a sports bike, Innenraum eines Tesla Model S 70D, Elektrisches Motorrad, Elektrisches Gelaendemotorrad beim Laden, Ladestation von Schrack Technik, Ladestecker an einem Elektroauto, Seller showing a Tesla Model S to a potential buyer, Solaranlage in Blumenform, Solarleuchte von Sonnenglas, Digital speedometer on an electric motorcycle, Unplugsticker auf einem Renault ZOE, Organic dates being sold at a fair, Autoverkaeufuer fuehrt den Tesla Model S einem potentiellen Kaeufer vor, Dashboard on a Tesla Model S 70D, Bosch electric motor on a heavy duty e-bike, Dockless e-scooters by Lime, Lotus Belle camping and event tent, Electric dirt bike plugged into a charger, Powerful looking bull made of scrap metal, Ampel-Paerchen mit Herz, Bio Muesli in luftdichten Behaeltern, Aus recyceltem Plastik hergestellte Taschen von Rossi, Brimful bottle bank, Close-up of GMC logo on a car, Ingwer Shots, Durchsichtiger Bienenstock, Lueftungsschacht in einem Park, Nachhaltig hergestellte Schuhe von Wildling, Nachhaltige HydrophilZahnboerste, Gay traffic lights in Vienna, Zero waste toothbrush by SWAK, GMC SUV, Nachhaltige Toilettenschuessel aus Holz, Opinel pocket knife and whetstone, Rossi Bags made of recycled plastic, Stier aus Altmetail, Sustainable shoes by Wildling, Transparent bee-hive, Wiener Ampel mit schwulem Ampel-Paerchen mit Herz, Uebervoller Glascontainer

Published in July 2019 (32 photographs): Robot at Maker Fair offering visitors salted pretzel sticks, A stack of classroom chairs at an abandoned school, Red star on the wall behind a an old gate, Old book and bottles in the rubble, Old Cola bottle at a squat toilet, Old broken hair dryer at an abandoned school, Old defective radio and file folders in the background at an abandoned school, Peeled off wallpapers hanging from the wall, Old rusty boiler at an abandoned school, Old radio hanging on some strings, Selbstraucher in der Hand, Bee smoker on a beehive, A row of beehives, Beehive with its cover taken off, Beekeeper holding a beehive frame full of honey and bees, Beehives with lots of agitated bees flying by very close, Beekeeper holding a new beehive frame, Beekeeper taking off cover on a beehive, Beekeeper inspecting a beehive, Beekeeper taking out a new beehive frame, Close-up of a beekeeper's hand holding a hive tool, Bucket full of water near a well, Corn cobs hanging on a string, Imker mit herumfliegenden Bienen und einige Bienenstoেকে im Hintergrund, Hauswurz in voller Bluete auf dem Dach eines alten Hauses, Bee landing on a sunflower, Bees attacking the beekeeper while he is handling the frames, Bees entering a beehive, Bees flying around while the beekeeper is taking a look at the frames, Close-up of a yellow garden spider, Close-up of a sunflower, Close-up of an unplucked tomato

Published in July 2019 (48 photographs): Close-up of a fish in dark blue water, Krokodil spiegelt sich im Wasser, Portrait of an Iguana, Prairie dog young, Wet crow in a stream, Pouring water into the old tractor's radiator, An old man working with a tractor excavator, Unripe and green tomatoes in a man's hand, Unripe tomatoes in a small greenhouse, Green cucumber in a man's hand, Close-up of unripe tomatoes in a small greenhouse, An old man driving a tractor excavator, Alter Mann fuehlt Kuehlwasser eines Traktors nach, European hamster at a city park, Man washing a salmon under a faucet, Nahaufnahme von Blaettern einer falschen Mimose und ein See im Hintergrund, Pilze am Waldrand, Nahaufnahme von orangefarbenem Lachsfleisch, Close-up of a gutted salmon on white background, Mann waescht einen Lachs unterm Wasserhahn, Mushrooms at a woodland edge, Man's hand on the orange flesh of a gutted salmon, Close-up of red iris flowers and a lake in the background, Yellow tongue after eating food spiced with turmeric, Baby sleeping in a baby buggy, Blood sausage with potatoes and grated horseradish, Blutwurst mit Kartoffeln in riesiger Pfanne, Rusty barb wire and blue sky in the background, Different types of photographic film, Schmuckhornfrosch in einem Terrarium, Verrosteter Stacheldrahtzaun mit blauem Himmel im Hintergrund, Post-apocalyptic vehicle with large wheels made of scrap metal, Baby Converse sneakers, Crazy machines made of scrap metal, Fehlermeldung auf einem Bildschirm der Wiener Linien, Flying mechanical beast made of scrap metal, Horseshoes being sold on the street. Good luck charm, Mechanical bird made of scrap metal, Abgeerntetes Feld und eine Ueberlandleitung im Hintergrund, Dechantlacke in Wien, Duck sitting by the lake, Harvested field with an overhead power line in the background, Green leaves on a tree and a blue sky, Flamingo close-up, Nahaufnahme eines Leoparden, Nahaufnahme eines Praeriehundes, Portrait of an Orang-utan, Bunter Fisch mit Spiegelung unter der Wasseroberflaeche

Published in July 2019 (51 photographs): Close-up of a penguin, Colorful fish and reflection under the water surface, Car overgrown with plants in front of an abandoned house, Chinese Magnolia, Close-up of a headlight on a rusty old car, Funny plant watering solution, Rusty old Yugo, Broken garage door on an abandoned house, Brinen auf dem Birnenbaum, Lustige Bewaesserungsloesung fuer Topfpflanze, Verrosteter alter Yugo, Purpur-Magnolie, Von Pflanzen ueberwuchertes Auto vor einem verlassenen Haus, Magnolia flowers, Huelsenfrucht eines Lederhuelenbaums, Close-up of red plums, Fruits of a honey locus tree, Graukarte in der Hand. Einstellung des Weissabgleichs, Nahaufnahme von Pflaumen auf einem Pflaumenbaum, Several bee hives on a field, Setting white balance with a grey card, Margerite und tiefblauer Himmel, Golden wheat before the harvest with the setting sun in the background, Rides for small kids on a trailer before the funfair, Bottom-up view of grapevine at a vineyard with blue sky in the background, Sun shining through grapevine at a vineyard, Country road under the blazing sommer sun, Field in golden light right before sunset, Wheat field a few days before the harvest, Landweg unter der sengenden Sonne, Goldfarbener Weizen wenige Tage vor der Ernte, Tag vor dem Jahrmarkt. Noch nicht aufgebautes Karussell, Oxeye Daisy and a deep blue sky, Weinstoেকে auf einem Weingut, Weizenfeld und tiefblauer Himmel, Injection machine by Plasticpreneur, Durchsichtige Waschmaschine, 3D printed toy lion, Nahaufnahme einer Funktionstast, Creepy robot with a giant eye, 3D printer printing a figure, CubeSolver Rubik's Cube solving robot, Damenhalskette im Stile eines Kettenpanzers, DIY robot controller with display, Transparent washing machine, 3D Drucker druckt Teile, Ausruestung fuer den Amateurfunk, Dursichtige Waschmaschine beim Schleudern, Chainmail armor style women's necklace, Kettenfahrzeug Roboter gesteuert von einem Einplatinenrechner, Small track vehicle robot built with a monoboard computer

Published in August 2019 (40 photographs): Mann baut Spielzeug Motorrad mit Schraubendreher zusammen, Kleiner Roboter mit Stift kritzelt auf einer weissen Flaeche, 3D gedruckter Helm aus der Fallout-Spieleserie, 3D printed blades of a small jet engine, 3D printer printing a dragon figure, Bicycle frame made of bamboo, Sustainable production, Batteries in the transparent board of an electric scooter, Boy playing a game on an Apple iMac, Close-up of a glowing light bulb, Decoration objects made of repurposed glass bottles, Futuristic looking 3D printed trouser belts, Close-up of a dismantled Hard Disk Drive, Hologramm unter einer Glaslocke, Iron man made of scrap metal. Creative recycling, 3D printed helmet of a Star Wars Stormtrooper with visible skull inside, Kleine zweibeinige Roboter von vom Duo hinter Robocoop, 3D printer printing with chocolate, Bipedal robot made of plywood, Circuit board of an AXIOM camera, Circuit boards with LED in the shape of small rockets, Close-up of a 3D printer printing a small toy figure, Young man wearing a HTC VIVE VR headset, Mockup of a Leonardo da Vinci's Glider, Polargraph drawing by robot project on github, Pilze wachsen auf einem Substrat, Portable solar panel with electronics, Robot CubeSolver loest einen Zauberwuerfel, Underside of a laptop after teardown. Visible parts, Small plywood bipedal robot made by Robocoop, Verstaerker von Laney angeschlossen an ein Eigenbau-Radio, Vertical farming at home with hydroponic system by Ponix Systems, A little girl collecting apples from the concrete, A little girl using a ladder to climb a slide, A little girl grasping for the apples, A girl walking down the path towards her mother, A mom playing with her daughter in the backyard. A little girl playing on her mom's legs, A mom teaching her daughter how to count using apples at the park, A toddler sliding down a slide, A young man holding a glass of iced coffee at home at sundown. Happy hour non-alcoholic beverage, Kleines Maedchen isst Aeepfel

Published in August 2019 (40 photographs): Damaged old Mercedes in the backyard of a farmhouse. Prepared for restoration, Toddler's feet and four ripe apples on the concrete. Playing with apples in the park, Portrait of a black dog in the backyard photographed through the fence, Toddler's hand on a trampoline safety net. Symbol of carefree childhood, A little girl giving her mom an apple. An apple in a toddler's hand, Marshall MG15DFX amp hooked up to a small DIY radio, Mushrooms growing on 3D substrate, Mockup of a Leonardo da Vinci parachute, Nachbildung einer Flugmaschine von Leonardo Da Vinci, Simple hologram made via rotation, 3D printed helmet from Fallout game series, Small robot with pen doodling on a large white surface, Analog card telephone on the hospital wall. Symbol of stagnation, Light beams coming from behind the cloud. Symbol of hope, Close-up of a fish swimming in the water, Close-up of a poisonous snake, Plant growing through a gab in the concrete. Finding a way to survive, Blumen unter geschmolzenen Stellen im Schnee. Das Leben findet einen Weg, Black crow sitting on a concrete poll, Dog waiting in the car, Grass under a patch of molten snow. Spring is coming, Square in Medina Tunis Tunisia, Clock tower on central square in Tunis Tunisia, Bardo National Museum Tunis Tunesia, Dirty glowing lightbulb, Huge icicles slowly melting away, Medina of Tunis Tunisia, Old World War 2 tank, Place de la Kasba Tunis Tunisia, Polizeiabspernung bei einer Demo, Oesterreichische Polizei bei einer Demo in Wien, Porsche illuminated by warm light at sunset, Black goat pushing its muzzle through a wire fence, Arbeiter schleift einen Stuhl mit Schleifpapier, A little girl in a glamorous dress knocking on a vintage door, A ruler a meter sandpaper and a pen on a table in a furniture workshop, A swan swimming in a

lake, A young man working alone in a furniture workshop, A workshop worker sanding a chair with sandpaper, Alter Mann schnitzt Holzmoebel
Published in August 2019 (25 photographs): Applying white paint to a small piece of wood with a spray gun, Realistic model of a Tyrannosaurus rex in a dino park, White ducks in a lake, Tools on the shelves in a workshop, Young worker sanding a piece of wood, Juvenile deer eating with other deer in the forest, Juvenile deer alone in the forest, Portrait of a juvenile deer in the park, Portrait of a beautiful duck in nature, Erfahrener Tischler bearbeitet ein Stueck Holz mit der Hobelmaschine, Experienced carpenter processing a piece of wood with a planer, Junger Arbeiter schleift ein Stueck Holz, An old man carving wooden furniture in a workshop, Carpenter sanding a chair with sandpaper in a small workshop, Carpenter fitting furniture parts together. Making furniture in a workshop, Close-up of a muzzle of a small black goat, Alte Cola Flasche auf einer Hocktoilette, Clothing hooks on the wall of an abandoned building, Close-up of peeling paint on the wall in an old abandoned building, Dead bird on the floor, Fallen-off tiles in the wash basin, Interior of an abandoned building, Piano keys in an abandoned building, Klaviertasten und ein kaputtes Klavier in einem verlassenen Gebaeude, Tapeten blaettern ab in einem verlassenen Gebaeude

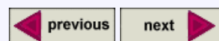
Published in August 2019 (43 photographs): Houseleek in full bloom on the roof of an old house, Imker inspiziert einen Bienenstock, Beekeeper using a bee smoker, Bees between the beehive frames, Close-up of a honey bee collecting nectar on a sunflower, Bienen fliegen den Eingang zum Bienenstock an.JPG, Close-up of a red pepper, Drops of honey on a beehive frame, Close-up of green peppers, Training a golden retriever in the garden, A bunch of old and rusty exhaust pipes at a car work shop, A damaged car with a deployed airbag, Auto auf dem Schrottplatz nach einem Unfall mit Totalschaden, Body of an electric guitar. Details of PRS custom blue matteo, Bird-shaped details on the neck of the PRS custom blue matteo guitar, Lemons in a basket on the grass, Children playing with a ball and running on a big field, Broken taillight on a car, Man assembling a red motorcycle toy with a screwdriver, Original signature logo of Viessmann heat water-air pump, Honigbiene auf einer Sonnenblume, Close-up of a bee smoker with bees flying around, Close-up capture of a beehive frame full of honey and bees, Imker verwendet einen Selbstraucher, Close-up of a beehive frame with honey and bees, Holding a corn cob in the hand, Holding onions in the hand, Holding unplucked blackberries in the hand, iFixit Mitarbeiter zeigt einem Jungen wie man ein Smartphone zerlegt, 3D Drucker druckt kleine Figur, 3D printed small parts including pokemon, 3D printer filament wires, 3D printed Toothless from How to Train Your Dragon, Black brief case made of wood leather, Cute spider-like robot, Close-up of a robot made of plywood, FPV racing drones on their starting positions before the race, Gameboy made with a Raspberry Pie single-board computer set by Conrad, Broken headlights on a vintage Mercedes, Aktivierte Airbags in einem Auto nach einem Unfall, Sorted lemons on a white plate from a bird's eye view, The broken front of a vintage Mercedes and its lost star logo, The front of an old crashed Mercedes w123 at a car junk yard

Published in August 2019 (41 photographs): A girl playing on a seesaw with parental support, A golden retriever posing in a yard, Nahaufnahme einer Gold-Wespenspinne, Nahaufnahme einer Honigbiene waehrend sie Nektar auf einer Sonnenblume sammelt, Nahaufnahme eines Selbstrauchers mit herumfliegenden Bienen, Nahaufnahme von ungepflueckten Brombeeren, Neues Wabenraehmchens mit vielen Bienen drauf, Bees buzzing around while the beekeeper inspects their beehive, Schmale Wabenraehmchen voller Honig, Bienen fliegen herum waehrend der Imker ihren Bienenstock inspiziert, Bienen vor dem Eingang zu ihrem Bienenstock, Maker sets by Conrad, Smartphone app controlled train on a small circular track, Man with FPV goggles and drone controller, Spider-like robot with visible wires, Weird kid friendly robot with large eyes, Young girl stamping leather, World Control tabletop game, Boy drawing with a 3D pen, FPV drones flying through a hexagonal hoop, Boy learning how to solder, Little girl controlling a small robot with a remote, Maiskolben auf einer Schnur zum Trocknen aufgehaengt, Narrow beehive frame full of honey, Nahaufnahme von ungepflueckten Tomaten, Nahaufnahme eines Wabenraehmchens mit Honig und Bienen, Smoking bees with a bee smoker, Dried calabash hanging on a string, Bienenzuechter nimmt ein neues Wabenraehmchens aus dem Bienenstock, Frame of an old beehive full of honey and bees. Lots of agitated bees flying around, iFixit staff member showing a young boy how to do a teardown of a smart phone, Taschen aus Holzleder, Junge lernt wie man loetet, Large printer printing a blue print for parts, Spinenartiger Roboter mit suesssem Gesicht, Mann mit FPV Brille bei einem Drohnenrennen, Imker haelt ein Wabenraehmchen voll von Honig und Bienen, Nahaufnahme eines Wabenraehmchens mit unzähligen Bienen und viel Honig, Smoke coming out of a bee smoker, Wabenraehmchen eines Bienenstock unter der Abdeckung, Viele Bienen fliegen herum waehrend der Bienenzuechter sich die Wabenraehmchen anschaut

Published in September 2019 (25 photographs): Portrait eines Schafs auf einem Biobauernhof, Schaefer gibt seinen Schafen Mais, Rabbit eating corn, Sheep coming out of the barn, Sheep grazing, Sheep eating corn in the barn, Handfütterung eines Bocks mit Mais, Fluss langzeitbelichtet, Wasser in Bewegung, Long exposure of a flowing river, Sternenhimmel ueber einem Feld, Stary night by the lake, Treeline and sunset colors mirrored in a lake, Baeume und Himmel beim Sonnenuntergang spiegeln sich im Teich, Golden crucifix pendant on a man's chest, TV antenna and a new moon in the background, Kleine Wassermelone im Feld, Close-up of a praying mantis on the road, Cloud over an island photographed from a plane, Domesticated rabbit inside its enclosure, Shepherd giving corn to his sheep, Fuetterung von Schafen mit Mais im Stall, Hase im Gehege, Close-up of a water melon in the field, Young ram beeing hand fed corn, Shepherd hand feeding his sheep corn

Published in September 2019 (45 photographs): Blauer Himmel ueber der Donau, Plastic bottle floating on water. Symbol of environmental pollution, Fischerboot an der Donau, Bootssteg an der Donau, Plastic bottle washed up on the river bank, Small fishing platform on the Danube river, Rubber flip flop floating on the surface of the Danube river. Water pollution, Nahaufnahme eiens Schwans an Land, Swan on land showing off for the camera, Nahaufnahme eines Schwans an Land, Old lady feeding swans in Vienna, Nahaufnahme eines Schwans bei der Fütterung, Blue sky over the Danube river, Green fishing boat on the Danube river, Boat bridge on the Danube in Veliko Gradiste Serbia, Plastikflasche treibt auf dem Wasser. Symbolfoto fuer Umweltverschmutzung, Landing stage on the Danube river, Gummilatsche treibt auf der Wasseroberflaeche der Donau. Wasserverschmutzung, Plastikflasche treibt auf der Wasseroberflaeche der Donau. Gewaesserverschmutzung, Close-up of a swan on land and two young man in the background obeserving the bird, Close-up of a swan feeding, Schwan an Land posiert fuer die Kamera, Gaggles of swans on the Danube river, Close-up of a swan on land and a man looking at it, Two men on a bridge photographed through a grid lattice, Plastic bottle floating on the surface of the Danube river. Water contamination, Newborn's feet in focus. Mother nursing a baby, Close-up of a MOTO GUZZI motorcycle, Vintage photography lens on white background, mo2drive Scooter Sharing in Wien, New moon behind the forest canopy, Pumpkin in tall grass, Sheep on a farm looking at the camera, A row of beehives on a ranch neer the forest, Small watermelon in the field, Close-up portrait of a sheep, Close-up portrait of a young ram being fed, Huge wood barrel in the cellar, Close-up of a spigot on a wood barrel, Old wine cellar full of cobweb, Old wooden tub in the cellar, Wine barrel in an old wine cellar, Weinaesser in einem alten Weinkeller, Wine barrels in an old cellar, Alter Wenkeller voll mit Spinennetz

Names: [Radic, Ivan](#)



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Exhibit

2

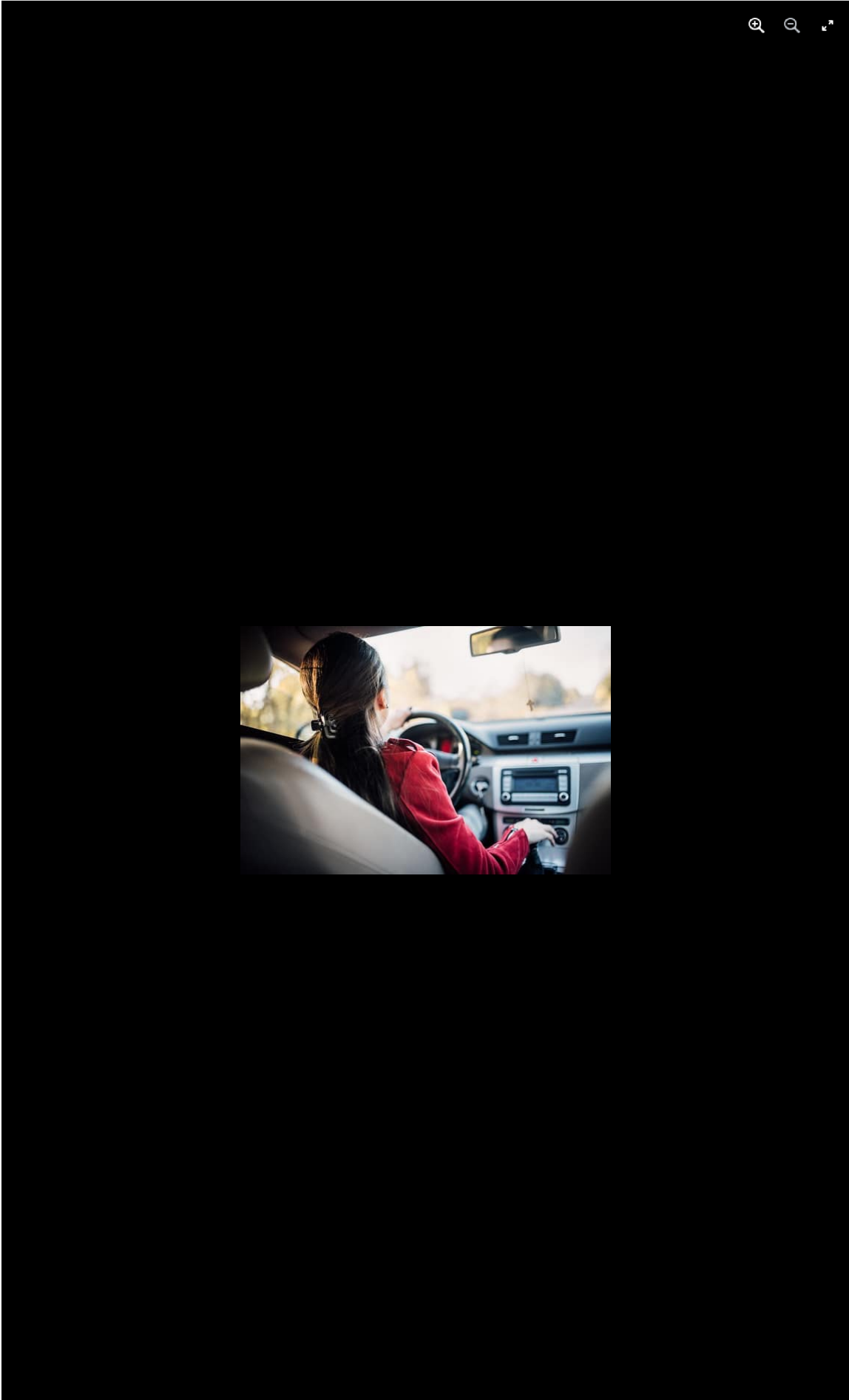
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Ivan Radic

(b) County of Residence of First Listed Plaintiff Outside US
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

SRIPLAW, P.A., 4102 McDuffie Street, Houston, TX
77098 Phone: 281.417.0850

DEFENDANTS

TE Prosperity Insurance Agency, LLC

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
17 U.S.C. Section 501Brief description of cause:
Copyright Infringement

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE

07/18/2024

SIGNATURE OF ATTORNEY OF RECORD

/s/ Sangheon Han

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RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

AO 121 (Rev. 06/16)

To: Register of Copyrights U.S. Copyright Office 101 Independence Ave. S.E. Washington, D.C. 20559-6000	REPORT ON THE FILING OR DETERMINATION OF AN ACTION OR APPEAL REGARDING A COPYRIGHT
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In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> ACTION	<input type="checkbox"/> APPEAL	COURT NAME AND LOCATION
DOCKET NO. 2:24-cv-00162	DATE FILED July 18, 2024	Southern District of Texas
PLAINTIFF Ivan Radic		DEFENDANT TE Prosperity Insurance Agency, LLC
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK
1 VA 2-239-707	A young woman in a red jacket driving a car	Radic, Ivan
2		
3		
4		
5		

In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading	
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK
1		
2		
3		

In the above-entitled case, a final decision was rendered on the date entered below. A copy of the order or judgment together with the written opinion, if any, of the court is attached.

COPY ATTACHED <input type="checkbox"/> Order <input type="checkbox"/> Judgement	WRITTEN OPINION ATTACHED <input type="checkbox"/> Yes <input type="checkbox"/> No	DATE RENDERED
CLERK	(BY) DEPUTY CLERK	DATE

DISTRIBUTION

1) Upon initiation of action, mail copy to Register of Copyright.

2) Upon filing of document adding copyright(s), mail copy to Register of Copyrights.

3) Upon termination of action, mail copy to Register of Copyrights.

4) In the event of an appeal, forward copy to Appellate Court.

5) Case File Copy.